# **EXHIBIT B**



UNITED STATES MINT MANUFACTURING DIRECTORATE

# STANDARD OPERATING PROCEDURE

DEPARTMENT: MANUFACTURING DIRECTORATE

NUMBER: H-MFG- MUTILATED-P-001

DATE: 01/17/2020

SUBJECT: MUTILATED COIN REDEMPTION PROGRAM

- 1.0 <u>PURPOSE AND SCOPE.</u> To establish guidelines for the Mutilated Coin Redemption Program (Mutilated Coin Program). The guidelines outline the mutilated coin submission process including Participant application, certification, Mutilated Coin Authentication, submission processing, payment processing, and Recycler invoicing.
- 2.0 BACKGROUND. The United States Mint (U. S. Mint), under the authority of 31 U.S.C. § 5120, established a program by which people and businesses could exchange bent and/or partial coins for reimbursement. This process is referred to internally by the Mint as the Mutilated Coin Program. Specific requirements of the Mutilated Coin Program are provided in Treasury regulations appearing in 31 C.F.R. part 100, subpart C. The reimbursement is based on the weight equivalent of the face value of the denomination submitted as mutilated. The Mutilated Coin Program is managed by the Mint at Headquarters in Washington, DC and operated by the Mint at Philadelphia (Philadelphia).
- 3.0 PROGRAM OBJECTIVES. The objectives of the Mutilated Coin Program are to:
  - 3.1 Reduce risk to the Mutilated Coin Program of potentially unlawful activity.
  - 3.2 Ensure the integrity of United States (U.S.) coinage.
  - 3.3 Provide Participants with opportunity for redemption of mutilated coinage.
  - 3.4

  - 3.6
- **STANDARDS REFERENCED.** The Mutilated Coin Program references the following regulations appearing in 31 C.F.R. part 100, subpart C<sup>1</sup>:
  - 4.1 §100.10 Request for Examination of Uncurrent Coin for Possible Redemption.
  - 4.2 §100.11 Request for Examination of Bent or Partial Coin for Possible Redemption.
  - 4.3 §100.12 Exchange of Fused or Mixed Coin.
  - 4.4 §100.13 Notices.

<sup>1</sup> http://www.ecfr.gov/

- 6.8 OTHER PROCEDURES AND POLICIES Participant Notification for Deficient or Rejected Applications or Mutilated Coin Shipments
  - 6.8.1 For deficient or rejected applications, mutilated coin lots that are not accepted for redemption, the Analyst prepares the appropriate communication informing the participant of the deficiency or rejected lot. The communication (letter or email) should include the following information:
    - 1. Why the application, mutilated coin shipment, or appeal was deficient or rejected.
    - 2. Directions on shipping the mutilated coin back to them at their expense (if the cause for rejection is that the Participant submitted mutilated coin that was rejected). Participant will pay coin postage expense through the ARC E-bill system.
    - 3. Instructions on if and when the Participant can reapply or resubmit mutilated coins.
    - 4. Information on the appeal process (if an appeal has not already been submitted and adjudicated).
    - 5. The Mutilated Coin Program Manager approves the letter and the Analyst sends the notification to the mutilated coin Participant.
  - **6.8.2** If coin was submitted with the application, the rejected coin is segregated from other shipments and held in the Mutilated Coin Section until the Participant claims it or it is scrapped.

#### 6.8.3

In such instances where the participant was notified to retrieve the entire submission,\ at the participant's sole expense, within 30 days., if the submission is not retrieved in a timely manner, the entire submission will be treated as voluntarily abandoned property, pursuant to 41 CFR 102-41.80, and will be retained or disposed of by the United States Mint.

- **6.8.4** On a case by case basis, the Mint may reject shipments from a Participant who violates, or attempts to violate, any of the regulations appearing in 31 C.F.R. part 100, subpart C, and prohibit them from participating in the Mutilated Coin Program for an appropriate period of time. After Legal review, the Associate Director of Manufacturing will review and determine the participant's shipment(s) status.
- 6.9 Mint Mutilated Coin Acceptance Criteria Detailed Description

## Case 1:20-cv-00518-MBH Document **56-3** Filed **03/02/21** Page 4 of 5

- **6.9.1** The Mint accepts for redemption:
  - 6. Bent or partial coins
    - Weighing no less than one pound (0.4536 kilograms)
    - o Separated by denomination / alloy category:
      - Penny
      - Nickel
      - Dime, Quarters, Half Dollars, and Eisenhower Dollars
      - Susan B. Anthony Dollars,
      - Sacagawea Golden Dollar, Native American \$1 coins, Presidential \$1 coins and American Innovation \$1 coins
  - The Mint will not accept for redemption mutilated coin that is:
    - 1. Not readily and clearly identifiable as genuine U. S. Mint coinage and distinguishable by denomination.
    - 2. Not presented separately by denomination category in lots of at least one pound for each denomination
    - 3. Submitted in a lot weighing less than one pound
    - 4. Containing lead, solder, or any other substance which will render them unsuitable for coinage.



- **6.9.2** Unacceptable items, not classified as mutilated coins, that the United States Mint does not redeem are:
  - 1. Fused coins
  - 2. Mixed coins
  - 3. Foreign coins
  - 4. Counterfeit coins (NOTE: All suspected criminal activity must be reported to the Treasury Office of the Inspector General (TOIG). This is done by notifying the Mint's Chief of Protection, who then reports to the TOIG.
  - 5. Genuine coins altered to pass as another denomination or manipulated to be mutilated (see note above)
  - 6. Slugs
  - 7. Precious coins (silver or gold).
  - 8. Uncurrent coins
  - 9. Miscellaneous metal objects

#### 6.9.3 Participant Appeal Process

- 6.9.3.1 If the Participant application to submit mutilated coin is rejected or if the Participant's mutilated coin shipment is rejected following inspection then Participant is informed by the Analyst (see 6.8.1) that they may submit a written appeal of the rejection within 30 days of receipt of the decision. If the Participant has sufficient information or explanation, the rejection decision can be modified.
- **6.9.3.2** The Participant submits the appeal including any and all relevant information as to why the rejection should be overturned through written

## Case 1:20-cv-00518-MBH Document **36-3** Filed **03/02/21** Page 5 of 5

statement to <u>MutilatedCoin@usmint.treas.gov</u> or USPS to the Mutilated Coin Program at the following address:

United States Mint

Attn: Mutilated Coin Redemption Program/Manufacturing Directorate 801  $9^{th}$  Street, N.W.

Washington, DC 20220

- **6.9.4** The Analyst notifies the Participant that their appeal has been received and **6.9.5** The Associate Director of Manufacturing reviews the Participant's appeal and determines if the reasoning is sufficient to overturn the decision.
- **6.9.6** If the Associate Director modifies the decision, the process continues depending on where the process was stopped.
- 6.9.7 If the Associate Director does not modify the decision, see subsection

# 6.10 Waiver Request Process

The following procedure outlines the process for requesting a waiver to not receive payment by Electronic Funds Transfer (EFT):

**6.10.1** Participants request a waiver by mailing or emailing the detailed reason(s) as to why the requirement should be waived to MutilatedCoin@usmint.treas.gov or via U. S. Postal Service to the Mutilated Coin Program at the following address:

United States Mint Attn: Mutilated Coin Program/Manufacturing Directorate 801 9th Street, N.W. Washington, DC 20220

Waiver requests must be submitted via email or postmarked within 10 days of the date the application was submitted in order to be considered.

#### 7.0 Records Retention

7.1 Unless documents are on a Legal hold, retain documents and records according to the United States Mint records retention policy (Mint Directive 4003.03) to include:

## 7.1.1 Shipping Labels

- Description: Receipts for Coin Deliveries
- Disposition: Destroy when 10 years old
- Schedule Number: NC1-104-79-1, item 163

### 7.1.2 Direct Deposit Forms (SF-388)

- Description: Accountable Officers' Files (site audit records, includes but not limited to GSA Standard Forms listed in GRS)
- Disposition: Destroy 6 years 3 months after period covered by account
- Schedule Number: NARA General Records Schedule 6, item 1a

#### 7.1.3 Weight Sheets

- Description: Daily Weight Sheets
- Disposition: Destroy when 1 year old
- Schedule Number: NC1-79-1, item 159